

  
OCEAN SHIPPING

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FCC - MAILROOM

February 20, 2004

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., TW325  
Washington, DC 20554

Dear Secretary:

TECO Ocean Shipping would like to enter the following comments into the record in response to Public Notice DA 04-378 and Petition RM-10321.

TECO Ocean Shipping owns and operates the largest U.S. flag fleet of bulk vessels operating coastwise. We are also active participants in the Tampa Bay Harbor Safety Committee and engaged across the board to improve the safety and security of Tampa Bay.

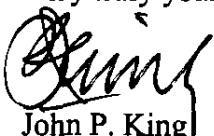
We strongly oppose Maritel's proposal to charge fees to support non-Coast Guard AIS applications. We are long term supporters of a very successful public-private partnership that has used AIS applications as a basis for a robust Vessel Traffic Information System that has improved safety, traffic management and security.

The imposition of fees as envisioned by the Maritel proposal would certainly reduce participation in our VTIS and stifle future initiatives for improvement. At risk would be a current proposal to upgrade our non-regulatory waterway management system.

The Maritel proposal also asks for suspension of the Commission's current AIS equipment type acceptance process. This is bad public policy at a time when the Coast Guard and ship owners are fully engaged in compliance efforts for MTSA-02, which requires AIS to be installed this year. It is simply too late to modify the requirements for equipment that is purchased and, in many cases, installed in compliance with federal regulations.

TECO Ocean Shipping strongly believes that the best interests of the public are served by current NTIA proposal, which allocates Channels 87B and 88B exclusively for AIS use.

Very truly yours,



John P. King  
Director Operations

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